



滞在を延期してオーランドの有名なテーマパークやレクリエーション・アクティビティをお楽しみください。

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PCS '95が業界で最も革新的なメーカーを紹介します。大手メーカーがいかにして消費者にぴったり合った製品を創造しているかを学んでください。またあなたのビジネスに必要な新しい供給者とのコンタクトを探することもできます。200以上の出展者が一堂に会し、競合製品を間近で比較することができます。いま賢明に購入することで将来の需要に備えましょう！

アフター・アワー

PCS '95での1日が終わったあとは、世界で最も人気の高い観光地、オーランドの有名なアトラクションをお楽しみください。

ウォルト・ディズニー・ワールド、ユニバーサル・スタジオ、シーワールドなどのテーマパーク、ケープ・カナベラルやケネディ宇宙センターをお訪ねください。またフロリダ海岸のビーチでのんびりと過ごしたり、近くのゴルフ場でゴルフを楽しむのもよいでしょう。

オーランドでは、1995年パーソナル・コミュニケーションズ・ショーケースのあらゆる催物があなたのご来訪をお待ちしています！

参加方法

1. 以下の登録書に記入し、以下のいずれかの方法で PCS '95 Expo Registration 宛てに返送してください：



FAX: 617-329-8090



〒: PCS '95 Expo Registration
150 Washington Street
Suite 411
Bedham, MA 02026-4449 USA



インターネットによる登録も可能

WEBアドレス：

<http://www.pcia.com>

インターネットEメール・アドレス：

exporeg.com

2. 以下の宿泊申込書に記入し、以下のいずれかの方法で PCS '95 Housing & Travel Information 宛てに返送してください：



FAX: 415-979-2270



〒: PCS '95 Housing
& Convention Management Resources
633 New Montgomery, Suite 2070
San Francisco, CA 94105 USA



FAX: 415-979-2292

3. お問い合わせ、または電話で登録をご希望の場合は、電話：617-329-9580 または FAX: 617-329-8090 までご連絡ください。

電話またはFAXの際は、正しい米国の電話番号をダイヤルしてください。

한 전시회 및 한 지붕 아래서 국제 무선 통신의 모든 분야와 장래성을 살펴 보십시오.

미국 플로리다주 올랜도시 오렌지 카운티 컨벤션 센터에서 1995년 9월 21일에 개최하는 PCS '95에 참가하시기 위해서는 지금 준비를 시작하십시오!

PCS '95는 오직 무선 통신에 대해서만 집중적으로 초점을 두고 있습니다. 음성 또는 데이터, 페이징 또는 셀룰러, 위성 통신 링크 또는 디지털 통신 등 어느 분야에 관심을 가지고 계시든 PCS '95에서 모든 것을 보시게 될 것입니다!

유럽, 북남미, 아시아 등 전세계의 통신 전문가들이 참석합니다! 무선 통신 산업에 종사하는 모든 지도적 기술 혁신가들이 참석합니다.

이들은 1995년에 산업, 장래성 및 전망에 대해 전반적인 최신 상황을 파악하는 데 이보다 더 좋은 곳이 없다는 것을 알기 때문에 올랜도로 오는 것입니다.

이 독특한 국제적 교육 행사에 참여하십시오.

PCS '95는 30회 이상의 강습회를 통해 모든 중요한 이슈를 취급함으로써 타의 추종을 불허하는 교육 기회를 제공합니다. PCS '95는 다음과 같은 것을 여러분에게 알려 드릴 것입니다.

- 어떻게 로밍, 에어 인터페이스 표준, 위성 서비스 및 시멀리스 통신 환경이 국제적으로 발전하고 있는가.
- PCS, 이동 데이터 및 기타 서비스의 미래는 어떠한가. PCS '95에서 새로 등장하는 국제 시장에 대해 심층 지식을 얻으십시오.
- 위성 통신 서비스는 전체 무선 통신 분야에서 어느 부분에 적합한지 그리고 국내 및 국제 규정이 위성 통신의 성장에 어떻게 영향을 미치는가.

외국 방문객들을 위한 특별 서비스를 즐기십시오.

PCS '95는 여러분의 방문이 즐겁고 보람 있도록 하기 위해 다양한 서비스로 외국 방문객을 맞이할 것입니다.

PCS '95의 인터내셔널 비즈니스 센터에는 여러분의 편의를 위해 통역사, 전화 및 휴게실이 마련되어 있습니다. 또한 여러분의 나라로 수출하는 데 관심을 가진 PCS '95 전시 업체를 소개하여 드릴 수 있습니다.

여행 지원, 식당 예약, 인근 명소에 대한 안내 등 여러 가지 도움을 인터내셔널 비즈니스 센터에서 받으실 수 있습니다.



참석 방법



올랜드의 유명한 테마 공원과 오락 시설을 방문하실 수 있도록 일정을 길게 잡으시기 바랍니다.

모든 최신 제품을 관람하십시오.

PCS '95는 업계에서 가장 혁신적인 제조업체를 소개하여 드립니다. 어떻게 성숙한 기술을 통해 고객이 활용할 수 있는 신제품을 개발하는지 배우실 수 있습니다. 여러분의 사업에 필요한 서비스를 제공하는 회사들과 만나실 수 있습니다. 200 개 이상의 회사가 출품하므로 경쟁 제품을 나란히 비교할 수 있습니다. 현명한 구입을 하시고 여러분의 미래가 요구하는 성공적인 거래를 하십시오!

업무외 시간은?

PCS '95에서 업무가 끝나면, 여러분은 세계 최고 관광지 가운데 하나인 올랜드 지역의 명소에 둘러싸일 것입니다.

월트 디즈니 월드, 유니버설 스튜디오 플로리다, 시 월드 등의 테마 공원을 구경하십시오. 케이프 카내베랄과 케네디 우주 센터를 방문하십시오. 플로리다 해변과 수많은 인근 골프장에서 느긋하게 긴장을 푸십시오.

이 모든 것이 올랜드에서 여러분을 기다리고 있으며, 추억에 남을 1995 Personal Communications Showcase 방문의 한 부분이 될 것입니다.

1. 동봉한 등록 양식을 완전히 작성하여 팩스 또는 우편으로 PCS '95 Expo Registration 앞으로 보내시기 바랍니다.



팩스: 617-329-8090



우편: PCS '95 Expo Registration
150 Washington Street
Suite LL1
Dedham, MA 02026-4449 USA



또한 인터넷을 통하여 등록하실 수도 있습니다.

웹 주소:

<http://www/pcia.com>

인터넷 전자 우편 주소:

pcia@exporeg.com

2. 동봉한 숙소 예약 양식을 완전히 작성하여 팩스 또는 우편으로 PCS '95 Housing & Travel Information 앞으로 보내십시오.



팩스: 415-979-2270



우편: PCS '95 Housing
& Convention Management Resources
33 New Montgomery, Suite 2070
San Francisco, CA 94105 USA



전화: 415-979-2292

3. 문의 사항이 있으시거나 전화로 등록하기를 원하시면 617-329-9580 번으로 전화하십시오. 617-329-8090 번으로 팩스를 보내시기 바랍니다.

전화로 전화를 하시거나 팩스를 보내실 때에는 정확한 미국 국가 번호를 사용하시기 바랍니다.

本行業最亮麗的博覽會，也將匯聚全球無線通訊的各個領域及首領。

PCS'95 將於 1995 年 9 月 21 日在美國佛羅里達州奧蘭多市橙郡會議中心舉行！請立刻作出赴會安排。

PCS'95 乃無線通訊設備精品專展。無論您感興趣的是話音還是數據、是傳呼服務還是蜂窩通訊、是衛星收發器材還是個人數字通訊設備，PCS'95 無所不包！

屆時將有來自歐洲、南北美洲、亞洲以及世界各地的通訊專家與會！為無線通訊行業服務的所有一流發明家將親臨會場解答您的問題。

他們之所以雲集奧蘭多，是因為他們知道 1995 年沒有任何其他展覽能夠像本屆博覽會一樣如此完備地提供無線通訊行業的最新發展狀況、潛力和前景。

參加別具一格的國際講習班

PCS 組織了無與倫比的教育活動，計劃共舉辦三十多期講座，內容涉及所有重大問題。您在 PCS'95 上一定可以瞭解到：

- 漫遊、空中界面標準、衛星服務和無縫通訊環境在全球範圍內的演進；
- PCS、移動數據及其他服務的發展前景。您在 PCS'95 上會深入瞭解世界各地正在形成的新興市場。
- 以衛星為基礎的服務怎樣與整個無線通訊行業融為一體，以及各國國內和國際上採取的管理措施對開發多用途衛星服務正在發生何種影響。

享受國外來賓的特殊待遇

PCS'95 為國外來賓安排了一系列服務，確保您在博覽會期間心情快樂，收穫豐碩。

PCS'95 國際業務中心為您準備了譯員、電話和休息室。我們還可以為您介紹對向您所在國家出口感興趣的參展公司。

安排行程、預訂旅館、介紹附近觀光景點 國際業務中心的服務內容應有盡有。



怎樣註冊

1. 請填妥隨信寄上的註冊表，然後寄回 PCS'95 大會註冊處，收件地址是：



電話：617-329-8090



傳真：PCS'95 Expo Registration
100 Washington Street
Suite 111
Boston, MA 02026-4449 USA



您還可以通過電子郵件註冊

WEB 地址：

<http://www.pcia.com>

Internet 電子郵件地址：

reg@exporeg.com

2. 請填妥隨信寄上的住宿登記表，然後寄回 PCS'95 住宿與航班資訊處，收件地



電話：415-979-2270



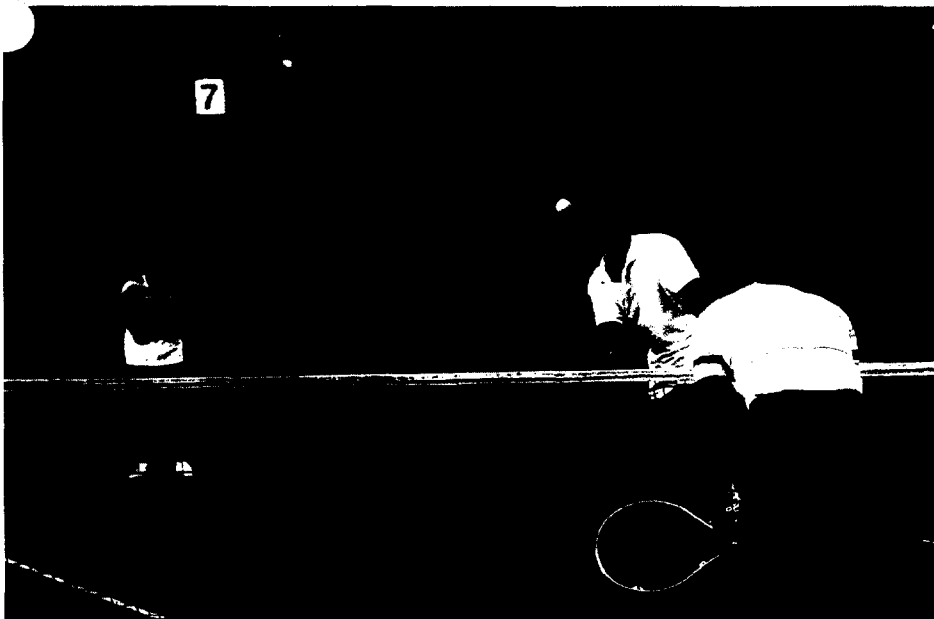
傳真：PCS'95 Housing
Convention Management Resources
100 New Montgomery, Suite 2070
San Francisco, CA 94105 USA



電話：415-979-2292

3. 如果您有疑問，或者希望打電話註冊，請用以下號碼和我們聯絡：617-329-9580 (電話)；617-329-8090 (傳真)。

當您在電話或傳真聯絡時，請注意使用代辦美國的正確號碼。



請多安排幾天時間，以便盡情享受奧蘭多著名的專題公園和遊樂活動。

通覽最新產品

PCS'95 將為您介紹本行業最富有創造性的生產廠家。您會瞭解到日臻完善的技術怎樣產生便於客戶使用的新型產品。您可以根據企業需求建立各種新的服務關係。本屆博覽會參展公司有二百多家，您可以對同類產品進行現場比較。您會作出明智的購買決策……敲定企業未來發展必不可少的有利交易！

怎樣消磨會餘時光？

作為全世界的熱門觀光勝地之一，奧蘭多地區的著名景點不可勝數，您在完成 PCS'95 的業務活動之後可以盡情遊樂。

您可以遊覽迪斯奈樂園的專題公園、佛羅里達環球電影遊樂場和海洋世界，還可以參觀卡納維拉爾角的甘乃迪宇航中心。另外，佛羅里達的海灘和附近的幾十個高爾夫球場都是放鬆的好地方。

奧蘭多的一切都在等待您……它們將和 1995 年個人通訊設備博覽會一樣，融入您的記憶之中，使您難以忘懷！

Preliminary Schedule

Exhibitor List

September

Registration 9:00 a.m.
Preconference Program 8:00 a.m.

September

Registration 7:30 a.m.
Super Session 9:00 a.m.
Exhibits Open 11:00 a.m.
Concurrent Sessions 1:00 p.m.
Opening Reception 4:00 p.m.
PCS '95 Gala* 7:00 p.m.

September

Registration 8:00 a.m.
Super Session 9:00 a.m.
Exhibits Open 11:00 a.m.
Concurrent Sessions 10:45 p.m.

September

Registration 8:00 a.m.
Special Session 9:00 a.m.
Exhibits Open 9:00 a.m.
Florida Brunch (Exhibit Hall) 9:00 a.m.

* Held at Universal Studios. Special ticket required.

3M/Telecom System Division
A.G. Beeper Accessories
AAT Communications
AccessLine Technologies
Accutech International
Advance Label & Tag
Advanced Signal
Allen Telecom Group
Allgon
Alpha/Argus
America's Network
American Management Systems (AMS)
Anchor Graphics
Andrew Corporation
Antel International Inc.
Arch Nationwide Paging
ARDIS
Assemble Products Corporation
Astron Corporation
ASTRONET Corporation
AT&T Network Wireless Systems
ATA Information Systems
Audiovox Cellular Communications
Baja Systems
Baker Products
Bee Electronics
Bell Atlantic
Bellicore
BIA Publications/Consulting
Brite Voice Systems Inc.
C.E.T., Inc.
Canamex Communications Corporation
Capital Data Systems
Casio Computer/Mitsui Comtek
Celcore Inc.
Cellular Business Magazine
Cellular Service Inc.
Celwave
Centigram
Centurion International Inc.
CNet
Collectech Systems Inc.
Communications Associates
Comp Comm Inc.
Computer Resources
COMSAT RSI
Comsearch
Converse Technology Inc.
Consortium of Consultants (Texas PCS)
Creative Applications Inc.
CSC
CSS Power Inc.
CTI Inc.
Cushcraft Corporation
Daniels & Associates
DAPA Communications
DataCard Corporation
Datron Telecommunications International
Desktop Paging Software Inc.
Devtek Electronic Packaging Systems
Diablo Communications
Digital Microwave Corporation
Digital Sound Corporation
Direct Paging
Direct Power Plus
Discover Card Services
DSP Communications Inc.
Dynamo Dresden Inc.
Eagle Telecom International
EDS Personal Communications
EDX Engineering
EMS Wireless
Engineered Endeavors
Enhanced Services Billing Inc.
Enhanced Systems Inc.

EPS Wireless
Ericsson
Escotel Software
ESI Cases & Accessories
Everon America
EVTEK Corporation
Excel Inc.
Excell Agent Services
Express Cellular Products
Fibrebond Corporation
Filtronic Comtek
Fireman's Fund
Freeman Engineering Associates Inc.
Frequency Management
FWT Inc.
Generac
Glenayre Electronics
GPD Associates
Grayson Electronics
GTE Government Systems
Haddcomm International Inc.
Hark Systems Inc.
Hazeltine
Hewlett-Packard
Huber & Suhner Inc.
Hughes Network Systems
Hy-Q International Inc.
IFR Systems Inc.
In-Touch Management Systems
Info Cellular
Information Radio Technology Inc.
Infostream
Integrated Site Development Co.
Intelligent Information
International Telecommunication Data Systems
Intuitive Software Solutions
JB Communications
JTECH
Kossuth & Associates Inc.
Lasertron
Lawrence Behr Associates Inc.
LCC Inc.
Le Blanc Communications
Leatex
Light Bridge Inc.
LOCATE/PCN-One
Marconi Instruments Inc.
Maxon America Inc.
Meridian Communications
Message Center USA
Microspace Communications Corporation
Milcom International Inc.
Minerich Inc.
Minilec Services Inc.
Miracom Technologies Inc.
MLW
Mobile Mark
Mobile Office Magazine
Mobile Systems International
MobileComm
Motorola Pan American
Paging Division
MTA-EMCI
NATCOM Inc.
NEC America Inc.
Network Building & Consulting
Network USA
NEXUS Telecommunication Systems
Nokia Mobile Phones
Northeastern Land Services Ltd.
Northern Technologies Inc.
Northern Telecom Inc.
NovaLink Technologies Inc.
NS&D
NSN Network Services
Omniport

ORA Electronics
Ortel Corporation
Output Services Group
P-Comm
Pacific Communication Sciences Inc.
PageNet
PageRepair Inc.
Panasonic
PCS Wireless
Personal Communications Industry Association
Phillips Business Information
Pinon International Inc.
PolyPhaser Corporation
Positive Communications
PR Communications Inc.
Qualcomm
RAM Systems Development
RCR Publications
Real Time Strategies
Reflection Technology
REO Enterprises
Richard Connor Riley & Associates
RMS Communications Group Inc.
ROHN
Rules Services Company
Sabre Communications
SAFCO Corporation
Samsung Telecommunications of America
Scala Electronic Corporation
Securicor Wireless Network
Seiko Communication of America Inc.
Shinwa Communications of America
SKYDATA Inc.
SkyTel
Socket Communications
Southern Micro Graphics
SpaceCom Systems
Spectrum Communications Corporation
Star Paging
Statistical Control Systems
Stealth Network Technologies Inc.
Steinbrecher
Subscriber Computing Inc.
SunGard Mailing Services
Sunrise Credit Services Inc.
Survey Technology Inc.
SW & Associates
Swatch
Szeto
TEC Cellular
TekNow Inc.
Teledynamics
TeleLink Technologies
Tempco Corporation
TGA Systems Inc.
The National Dispatch Center
The PAL Group
Times Microwave Systems
TowerWatch Inc.
TRW
TWR Telecom Inc.
Unibridge
Uniden America Corporation
Valley Products Corporation
Vaimont Industries
VCP International
W&W Associates
Wacom Products Inc.
Wavetek Corporation
Western Multiplex
Wireless NOW
Zetron Inc.

3

3

ISSUES OF PARTICULAR CONCERN TO ANTICIPATED AUDIENCE

The following issues are of particular concern to PCIA's membership and the likely audience at *PCS '95* in Orlando:

- I. MICROWAVE RELOCATION (TAB A)
 - A. Balancing rights of incumbents and PCS licensees (TAB B)
 - B. Microwave relocation cost sharing (TAB C)
- II. BUILDING THE WIRELESS INFRASTRUCTURE
 - A. Responsible policies governing siting of wireless telecommunications facilities (TAB D)
 - B. Access to government lands and facilities for siting purposes (TAB E)
- III. NUMBERING ADMINISTRATION
 - A. Exhaust of toll free numbering resources and access to toll free numbers for personal communications services, such as paging (TAB F)
 - B. NPA relief activities (TAB G)
 - C. Future administration of the North American Numbering Plan (TAB H)
- IV. SPEEDING AUCTIONS OF REMAINING PCS LICENSE (TAB I)
- V. BROADCASTER FLEXIBILITY (TAB J)
- VI. MARKET AREA LICENSING OF PAGING (TAB K)
- VII. INTERCONNECTION AND RESALE POLICIES (TAB L)

Brief descriptions of these issues follow, with some background reference materials, as appropriate. Please do not hesitate to contact Mark Golden at PCIA for additional information on this or any other issue.

A

MICROWAVE RELOCATION

Some 9,000 microwave links are deployed in the spectrum allocated to licensed, broadband PCS. While in some areas of the country it may be possible for PCS to co-exist with these incumbents, at least in the short term, in many key markets the relocation of microwave facilities is a necessary prerequisite for the deployment of services.

PCS licensees are obligated to protect incumbent microwave licensees from interference from PCS operations and, when this is not possible, to relocate them to comparable facilities outside the PCS spectrum. The full cost of this relocation is the PCS operator's responsibility. The PCS operator is also obligated to guarantee that the new facilities are comparable and, if this does not prove to be the case, return the microwave licensee to their original facilities.

PCIA has identified several problems which could thwart the successful deployment of broadband PCS. Some simply require clarification: others require a rulemaking proceeding. PCIA has identified these issues to the Commission and is urging the most rapid possible action to address them.

CHALLENGES FACING THE PCS INDUSTRY

The FCC has put significant effort into establishing a framework for the auctioning of 2 GHz spectrum for the provision of new Personal Communications Services (PCS) and the transition of the band from fixed microwave operations to PCS. The Personal Communications Industry Association (PCIA) has played a major role working with the PCS industry and the Commission to facilitate the deployment of the new products and services that will change the face of the communications industry. As the time for actual deployment of these new services arrives, it is critical that the Commission act quickly to remove some obstacles that threaten the successful conclusion of all of the Commission's work over the last several years. PCIA urges the FCC to take rapid steps to resolve these issues, some of which only require clarification of the PCS Rules while others may require a rulemaking proceeding.

ISSUES REQUIRING CLARIFICATION:

Microwave Incumbents Are Entitled Under FCC Rules to a Comparable System, Not Premium Payments. The Commission should clarify its rules and clearly state that the 2 GHz transition rules are to protect incumbents from injury due to relocation and not to be used to extract additional payments above the cost of a comparable system from PCS providers. Some incumbents seem to misunderstand the FCC's regulations and believe that they are free to threaten to delay deployment of PCS unless large premiums are paid.

A Public Notice Starting the Voluntary Relocation Period for Microwave Relocation for All PCS Spectrum Blocks Should Be Promptly Issued. The Commission announced that the start date for A and B Block voluntary microwave relocation periods was April 5, 1995. However, A and B Block licensees may need to clear microwave links from the adjacent channels in the C, D, E and F Blocks in order to deploy their systems. Therefore, a public notice should be released which starts the voluntary negotiation period for all PCS blocks. PCIA notes that starting the voluntary negotiation period in no way changes the one year notification that microwave licenses are guaranteed in the rules. (Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, 8 FCC Rcd 6589, 6595 ¶ 15 (1993)).

The 12 Month Testing Period for Relocated Microwave Licensees Should Begin When the Cut-Over to the New System Occurs. The transition rules should be clarified to state that the 12 month testing period for an incumbent's new system begins when the incumbent starts using the new system. This will eliminate any ambiguity as to when the new system is accepted.

When the 12 Month Testing Period Ends, the Party Holding the License Should Surrender the Authorization and the FCC Should Issue a Public Notice Stating That the Link Has Been Decommissioned. So that there is no confusion among PCS licensees trying to deploy their systems as to which microwave licenses are still authorized, the microwave license for a relocated licensee should be surrendered to the FCC when the testing period has expired, and the Commission should issue a public notice so all PCS licensees will be aware that the incumbent has been successfully relocated.

ISSUES REQUIRING A RULEMAKING PROCEEDING:

The FCC Should Initiate A Rulemaking Proceeding and Adopt A Mandatory Cost Sharing Plan based on PCIA's Consensus Proposal. To facilitate the rapid relocation of the microwave licensees in the 2 GHz band, the FCC should adopt rules consistent with the proposal filed by PCIA. The PCIA proposal protects the interests of PCS providers and microwave incumbents, takes advantage of the efficiencies from a coordinated relocation process, and minimizes the administrative burden on the Commission.

No Additional Microwave Links in the PCS Spectrum Should Be Granted Primary Status. The initial PCS auctions have been completed and PCS providers are beginning to relocate microwave incumbents in their license areas and deploy PCS systems. Any new links granted primary status by the Commission will only increase the number of links that PCS providers must relocate and delay the delivery of PCS to the public.

PCS Providers Should Be Allowed to Hold a Relocated Microwave Incumbent's License During the Testing Period. The FCC should modify its rules to allow a PCS provider to hold the incumbent's license during the 12 month testing period. This will ensure that at the end of the testing period when the incumbent is satisfied with its new system, the PCS provider can surrender the license to the FCC and see that a public notice is issued.

* * *

Swift action by the Commission to address these issues and ensure that the deployment of PCS is not delayed and that these new services are available to the public on an expedited basis.



MICROWAVE RELOCATION

A. Balancing rights of incumbents and PCS licensees

FCC rules govern the relocation process. These rules were crafted to provide absolute protection to incumbent microwave licensee: they ensure that the microwave incumbent suffers no operational or economic harm from the relocation process.

PCIA fully supports this approach: in fact, the microwave relocation plan adopted by the FCC in ET Docket 92-9 is based upon a consensus proposal developed by the association and submitted to the Commission in June of 1992.

Some incumbents, however, are attempting to use these rules to extract additional payments above the cost of a comparable system, leveraging off their ability to delay deployment of PCS services.

PCIA believes the Commission should clarify that microwave incumbents are entitled to a comparable systems, not premium payments.



Jay Kitchen, *President*

April 28, 1995

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Re: PCS/Microwave Relocation Issues

Dear Mr. Chairman:

The Commission's allocation of spectrum for Personal Communications Services ("PCS") and, in particular, the PCS band plan that was largely a product of your office's tireless work with the industry, represents a major achievement for the agency. More recently, the smooth and timely implementation of the auction for the A and B block spectrum exceeded virtually everyone's expectations, both within and outside the agency. You are to be commended for your efforts in placing these valuable PCS licenses in the hands of entrepreneurs who, in turn, may now proceed to provide innovative and beneficial services to the public.

The PCS industry is now gearing up for the difficult work required to bring your vision, and the vast promise of this exciting new technology, into reality. For example, PCIA is now developing plans for facilitating the relocation of entire microwave systems, as opposed to ad hoc replacement of individual microwave links, in response to microwave licensees' concerns. PCIA's efforts also include continued exploration of the feasibility of implementing a cost sharing program to encourage coordinated relocation activities among affected PCS providers.

Unfortunately, just as PCS is moving forward, it has become apparent that there exists a substantial potential for serious troubles to arise from abuses of the rules adopted to protect microwave licensee interests in the relocation process. These troubles threaten the realization of the Commission's goals for prompt deployment of PCS service to the public notwithstanding the PCS industry's commitment to that process.

PCIA firmly and unquestionably supports the rights of microwave licensees to the provision of full cost compensation and comparable alternative facilities in exchange for their agreement to relocate from the PCS spectrum. Indeed, PCIA has worked very hard in

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Tel: 202-467-4770
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Fax: 703-536-1008

PCIA is the consolidation of the Personal Communications Industry Association and the National Association of Business and Educational Radio

Honorable Reed Hundt

April 28, 1995

Page 2

this context. The current rules largely track PCIA proposals and most recently the Association worked hard to maintain tax relief for relocation sales and exchanges. However, it has now come to PCIA's attention that those rules may be misused by certain parties to achieve perverse results which were unintended by the agency and are clearly not in the public interest.

At least one major organization seeking to represent collectively microwave licensees in the relocation process has distributed materials that graphically underscore and promote the use by incumbent microwave licensees of their inherent bargaining leverage to extract excessive premium payments in relocation negotiations. This marketing material clearly suggests exploiting the FCC's safeguards -- which were adopted to protect microwave licensees from being abused themselves -- to extract enormous payouts from PCS licensees. That material stresses the economic pressures faced by PCS licensees who need to move quickly to implement service because of the substantial financing costs that would result from any delay and points out the control a microwave licensee can exercise to block prompt service deployment by stalling on its relocation negotiations. The implicit message conveyed is that the combination of the existing rules and the large sums paid out by auction winners encourage strategic behavior by microwave licensees that the FCC never contemplated, never would endorse, and should not tolerate now.

If this suggested pattern of abuses materializes, the FCC can and should consider several options to prevent such misuse of its rules. First, the Commission should consider whether the voluntary negotiation periods afforded under the rules should or, indeed, can be maintained in an environment where microwave licensee organizations are seeking to misuse them for purely private pecuniary gain. Elimination of such periods could go a long way toward diffusing the threat that microwave licensees could delay the introduction of PCS services as a means to extract unwarranted concessions.

Second, the FCC should consider whether or not to place a limit on the total cost compensation and value of comparable alternative facilities available to microwave licensees in order to eliminate any possibility that an unmerited premium could be sought or obtained during the mandatory negotiation period.

Finally, the Commission should consider whether the current 12 month testing period -- which permits a microwave licensee to be returned to its original facilities within a year after cutover to new facilities where the latter prove not to be comparable -- should be eliminated to prevent efforts by microwave licensees to extract premiums for early release from this obligation.

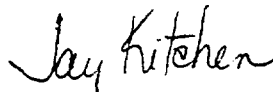
Honorable Reed Hundt

April 28, 1995

Page 3

As stated above, PCIA is strongly committed to facilitating the achievement of the Commission's and the industry's goals for early deployment of PCS. PCIA therefore urges you to take whatever actions may be necessary to ensure that the economic interests of private parties are not permitted to interfere with the public interest in delivery of these important and valuable services.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jay Kitchen". The signature is written in dark ink and is positioned above the printed name.

Jay Kitchen



Phone (202) 331-9491
Fax (202) 331-7639

November 21, 1994

IMPORTANT INFORMATION FOR ALL 2 GHz LICENSEES

Big Money and Your 2 GHz Microwave Band Relocation

Dear 2 GHz Licensees:

The Federal Communications Commission (FCC) has received 74 applications to participate in an auction, beginning December 5, 1994, of 99 Major Trading Area licenses to provide Personal Communications Services in the 2 GHz band (broadband PCS) on frequency blocks A and B.

As expected, the bidders for the MTA licenses include some of the largest telecommunications companies in the United States. Among those submitting applications were:

- Associated Vencap (Associated Communications)
- AT&T Wireless PCS Inc.
- Continental Cablevision, Inc.
- Radiofone Nation-wide Paging Services, Inc.
- American Portable Telecommunications, Inc.
- WirelessCo, Limited Partnership (Consortium of Sprint, Comcast, Cox Communications and Telecommunications, Inc.)
- GTB Macro Communications Corporation
- PCS Primeco Limited Partnership (Consortium of Nynex, Bell Atlantic, US West and Air Touch)
- BellSouth Personal Communications, Inc.
- Comcast Telephony Services II, Inc.
- Cox Cable Communications, Inc.
- Pacific Televis Mobile Systems
- Southwestern Bell Mobile Systems, Inc.

I also wanted you to realize that 74 PCS providers:

- ☒ Are Investing "big" money.
- ☒ Want their investment to work.
- ☒ May be the proud owners of your 2 GHz microwave license in the very near future.
- ☒ Are in a hurry to enter the market.

AND WHAT HAVE YOU DONE?

- ☒ Will you be ready for the transition?

1140 Connecticut Avenue, N.W., Suite 1115, Washington, DC 20036

IMPORTANT INFORMATION FOR ALL 2 GHZ LICENSEES

Page 2

These applicants were required to submit their upfront payment for the December 5 auction by Friday, November 18, 1994.

For example, the upfront payment by a PCS provider for the following four Major Trading Areas, consisting of either one or two 30 MHz MTA Frequency blocks, amounted to:

<u>Market No.</u>	<u>Major Trading Area</u>	<u>Population</u>	<u>Upfront Payment</u>	<u>Block(s)</u>
M-1	New York	26,410,597	\$ 15,846,399	B Only
M-3	Chicago	12,069,700	\$ 7,241,820	A & B
M-10	Washington-Baltimore	7,777,875	\$ 4,666,725	B Only
M-34	Kansas City	2,913,304	\$ 1,747,983	A & B

* Upfront Payment = Population x Block Size in MHz x \$.02

The upfront payment is small compared to the "big money" the successful bidder will have to pay for a PCS license in the December 5, 1994 auction.

Money issues are always interesting and intriguing. Following is an example of the amount of investment which might be made by a PCS provider for the Major Trading Area No. 10, Washington-Baltimore:

<u>Market No:</u>	10
<u>Major Trading Area:</u>	Washington-Baltimore
<u>Upfront Payment:</u>	\$ 4,666,725

Interest otherwise earned on upfront payment:

8% YEARLY INTEREST RATE OTHERWISE EARNED:	\$ 373,300
8% MONTHLY INTEREST RATE OTHERWISE EARNED:	\$ 31,100

<u>Possible Auction</u>	\$752,000,000
<u>Bidding Price for MTA No. 10</u>	due and payable 5 days after the license has been awarded.

Interest otherwise earned on auction investment:

8% YEARLY INTEREST RATE OTHERWISE EARNED:	\$ 60,160,000
8% MONTHLY INTEREST RATE OTHERWISE EARNED:	\$ 5,000,000

IMPORTANT INFORMATION FOR ALL 2 GHz LICENSEES

Page 3

Marketing issues are also very interesting. Now that we have learned how the PCS provider who invested in the Washington-Baltimore License Block B could receive, conservatively speaking, a monthly interest of — WOW! — \$5,000,000 on his auction investment, we can determine without a doubt that the PCS provider will be most anxious to enter the PCS market in a hurry to recoup its investment. The PCS provider needs to enter the market the minute he has been issued the 2 GHz license. *The PCS provider cannot afford to lose \$5,000,000 per month and more, especially since he will have to spend millions or even billions more to build his network.*

NOW THE MOST IMPORTANT QUESTION, YOU THE 2 GHz LICENSEE SHOULD ASK:

"What have I done to be ready for the transition?"

Over the past several months we have suggested that you plan early. We asked you to address crucial decisions about your relocation, such as:

- Where to go?
- What should the compensation package include?
- What negotiation strategy should I employ?

Are you prepared to accomplish this major transition task alone? If not, UTC Service Corporation and its Transition Team can assist you.

Call us today toll-free at 1-800-900-4882 and find out how we can assist you in relocating from the 2 GHz band.

Sincerely,



Trudy Richmond
Marketing and Sales Manager

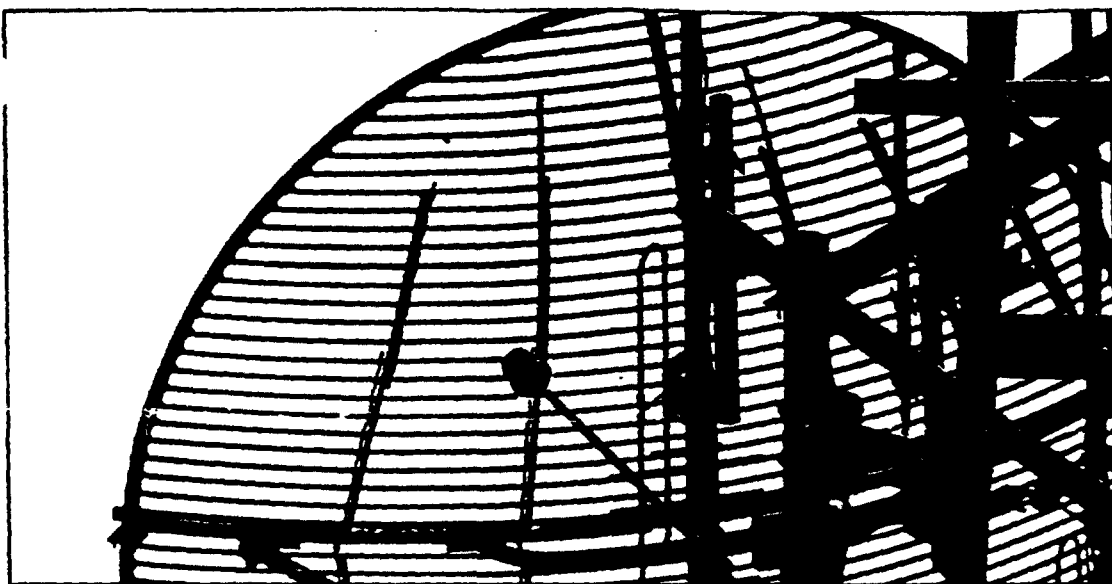


Illustration by Robert Ruppberg

Found Money on City's Info Highway

By Melinda Powelson

John Eger, San Diego's self-professed wizard of telecommunications, has an interesting history. A former CBS broad-

casting executive, Eger has advised the likes of past presidents Richard Nixon and Gerald Ford on telecommunications. And since moving in

San Diego six years ago, Eger has succeeded in making himself an indispensable advisor to Mayor Susan Golding.

Two years ago, Eger, now a

professor at San Diego State, was appointed to the board of the San Diego Data Processing Center, a city-owned agency that provides the city with computer services. He also serves as chairman of Golding's City of the Future Committee, a group intended to make San Diego the "hub of information technology."

Now Eger is involved in another city project — but this time, he's getting paid. Last month, City Manager Jack McGraw awarded a \$245,000 contract to a nine-member consulting team led by the Washington, D.C. law firm,

Keller and Heckman. Eger will serve as the group's "strategic advisor" for a fee of \$270 an hour.

The consultants' assignment: to help negotiate a deal that may be worth millions of dollars to taxpayers. Or maybe not.

Next year, big cable and telephone companies want to begin offering a new kind of "personal communication system," supposed to revolutionize the way America communicates. Tiny pocket cellular phones will be able to take incoming calls and pages and serve as an answering machine — all for a nominal fee.

But before telecommunications companies can proceed, they have to clear airwaves currently used by local government for police, fire, and ambulance transmissions. Cities have been ordered to find another frequency on the spectrum for their networks. By law, the new occupants of the frequencies must pay for the expensive equipment required to build new systems for the cities.

Tension is mounting: the cities want to be compensated for moving, while communications companies, anxious to market their products as soon as possible, say they don't want to be coerced.

The Keller and Heckman team is being paid to determine how much money the city should charge for the move. The law firm will also evaluate unspecified "strategic partnerships" with telecommunications firms.

"That has John Eger's fingerprints all over it," says Michael Shames of UCAN

(Utilities Consumer Action Network), a consumer watchdog group. He points out that Eger has encouraged public-private partnerships in the past.

Other cities across the country are grappling with the same problem. But instead

"We wanted to move quickly on this and not hold up the new technology," says Richard Wilken of the city's communications department. "The issues that we are facing are highly technical. There are going to be very complex negotiations."

That's where Eger and the consulting team comes in. "We didn't have the expertise to participate in these negotiations," Wilken explains, "so we hired a consultant to come up with a plan." The city reviewed three applicants and ultimately chose Keller and Heckman. The team is led by Richard, who specializes in telecommunications. Other participants include Charles F. Lichten and Jeffrey R. Riddle of the Strategic Policy Research Center in Maryland; Mark S. Rosen and Klaus Rende of the Industry Telecommunications Association; and Eger, who heads up "strategic planning." (Like Eger, Riddle and Lichten also charge \$270 an hour.)

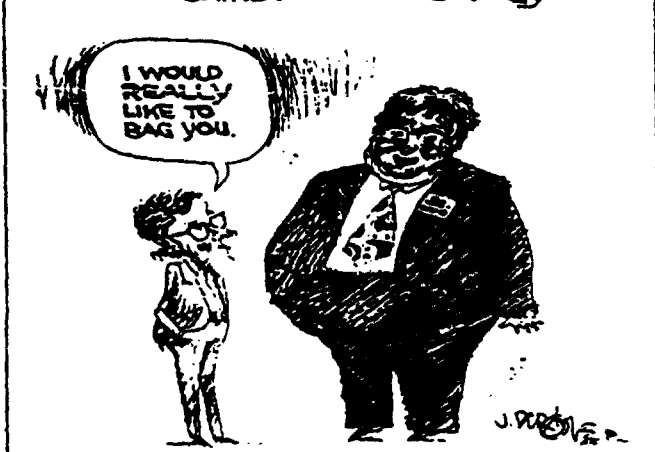
Wilken admits that Eger's participation gave the Keller and Heckman proposal an advantage over the other consultants. "We liked the fact that they had someone who knew what the situation here was," Wilken says, adding, "I absolutely don't think it's a conflict."

Shames disagrees, saying Eger's participation raises some important questions.



Michael Shames

CHRISTO MEETS COPLEY



of hiring costly consultants. Los Angeles, San Francisco, Portland, and Seattle are all handling the negotiations on their own. "We don't want to waste the taxpayers' money," says Joel Harrington of Portland. "This is an issue of securing emergency communications — not about making Washington, D.C. lawyers rich."

The debate began when the Federal Communications Commission (FCC) decided to reevaluate how it divided the radio spectrum. To accommodate the booming cellular industry, the FCC ordered the cities to move.

Telecommunications giants Pacific Teleson and Cingular have paid \$20 million to secure licenses in San Diego for the new wireless services. Both companies are then want to be on the air and start marketing their services by 1990.

"We really don't know why [Eger] sits on the City of the Future Committee," Shames says. "Did he do it because he is really interested in finding the best services for the city? Or did he do it so that he could get lucrative city contracts?"

Two weeks ago, Cindy Hicks, Eger's secretary, said her boss was traveling abroad and that she would contact Eger about questions regarding his role in the consulting project. Eger did not return calls. In response to subsequent requests, Hicks said Eger was still out of the country.

"We determined that Mr. Eger's role in the mayor's City of the Future Committee had nothing to do with the contract we are talking about," says Assistant City Attorney Curtis Fitzpatrick. "The committee is not going to vote on

Continued on page 9

Info highway

continued from page 5

any of the microwave relocation issues. The city is not going to take the position that everyone who has volunteered for a transmitter is trying to get a contract. That is not a legal issue."

No other major West Coast city has hired outside consulting firms to assist with negotiations. "We are handling this in-house," says Ken Chan, of the City of Los Angeles, which is also negotiating with Pacific Televis and Cox Cablevision. "We have already been notified of their intent to use our microwave bands, and we are beginning the negotiation process," he says. Chan estimates that it

continued on page 20

CITY LIGHTS

continued from page 9

will cost the companies roughly \$1 million to move the city's system.

Portland communication director Harrington says his city has also decided to negotiate without consultants. "The only people who are going to benefit from this are the high-priced consultants, who get paid ridiculous amounts of money. Most cities should be able to do this on their own."

San Diego's Wilken disagrees. "This is a very complicated area of the law, and it's an important decision for San Diego. We wanted to make certain that we understood all of the options available to us in these negotiations." Furthermore, he adds, the consulting fees will ultimately be paid by Pacific Televis and Cox — not the taxpayers.

Chan says that his department never even considered the possibility of public-private partnerships. "All we want to do is protect the city's emergency communications network," he says. "This is an opportunity to upgrade our system, at no expense to the taxpayers. I don't think it is appropriate to be speculating about public-private ventures."

Portland's Harrington agrees. "This isn't about looking for opportunities to make money. This is about securing emergency communications systems for the metropolitan area. We've already moved our entire communications system. What I want to do is recoup some of the cost of the relocations."

But San Diego's Wilken says that Portland and L.A. may be missing out on a once-in-a-lifetime opportunity. "We have been getting calls from all over the U.S. asking us for advice," he says. "We want to make sure that we build a state-of-the-art communications network."

However, industry analysts warn that San Diego shouldn't be so eager.

"There are some heightened expectations out there that have to be dealt with. 'Bilking' would not be too strong of a word," says Mark Golden, of the Personal Communications Industry Association.

"Everyone thinks that because [Pacific Televis and Cox] have paid millions for the licenses, that they have limitless deep pockets," continues Golden. "City officials think that they may have discovered a way to help balance the budget. That is categorically untrue — and unfair to the industry. This should be a win-win for everybody."

Wilken says San Diego has no intention of extorting money from the providers. "We want to resolve this issue to the benefit of the taxpayers, but we don't intend to do it at the cost of the new technology." ■

C

MICROWAVE RELOCATION

B. Microwave relocation cost sharing

Completing the relocation process in a timely manner requires the establishment of strong incentives for microwave licensees to relocate and the removal of disincentives for relocation.

PCIA's Microwave Relocation Task Force, which has been aggressively addressing this critical concern since 1994, recognized that many links fall in more than one PCS licensee's geographic market and/or spectrum. Moreover, incumbents have expressed a strong preference to have entire systems, not individual links, replaced. A mechanism for allowing PCS licensees to share cost of microwave relocations in such cases was identified by the industry as a priority issue.

PCIA proposed such a cost sharing plan in Docket 90-314. While the Commission failed to act on PCIA's proposal at that time, the imminent deployment of PCS systems has raised the level of urgency in securing a resolution in this matter.

Pacific Bell (a PCIA Microwave Relocation Task Force participant) filed a *Petition for Rulemaking* in May 1995 which refined PCIA's original proposal and made the case for adoption of a cost sharing plan on an expedited basis. PCIA's task force made further refinements to the plan and secured a broad ranging consensus of PCS licensees in support of the PCIA proposal.¹

Expeditious implementation of cost sharing is a priority issue for the broadband PCS industry.

¹ Ameritech, American Personal Communications, Bell South Wireless, Ominipoint Communications, Pacific Bell Mobile Services and Western PCS Corporation, companies with PCS A and B block authorizations covering approximately 100 million POPs, were signatories on PCIA's cost sharing plan; Comments filed demonstrated overwhelming support among both PCS licensees and the microwave industry.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Petition for Rulemaking)	
of Pacific Bell Mobile Services)	RM-8643
Regarding a Plan for Sharing)	
the Costs of Microwave Relocation)	

**COMMENTS OF
THE PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION**

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June 15, 1995